ENVIRON

April 26, 1995

Mr. Gregg Kwey
Senior Water Resource Control Engineer
California Regional Water Quality Control Board
- Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

RE: Well Investigation Program
ITT Corporation
1200 Flower Street
Burbank, California 91502

Dear Gregg:

During recent implementation of the *Report for Subsurface Investigation of Petroleum Hydrocarbons and Work Plan for Additional Subsurface Investigation, Building 2, ITT Facility, Burbank, California* (approved by the Los Angeles Fire Department on November 22, 1994), specifically, following removal of a concrete slab in the southern corner of Building 2, a sump/clarifier was uncovered (Figure 1). (At this time, it is uncertain as to whether or not the structure is a sump or a clarifier.) The previous existence or use of a sump/clarifier at this location was not known. In an effort to obtain the appropriate permits to remove the sump/clarifier, ENVIRON contacted the Glendale Department of Fire Protection and spoke with Mr. Wayne O'Shana. Mr. O'Shana advised us that the property is located in a Well Investigation Program zone and the clarifier removal should be handled through the Regional Water Quality Control Board (RWQCB). At the request of Ms. Ana Veloz of your office, the following workplan describes the sump/clarifier removal procedures and post-excavation sampling procedures that we will employ, with your concurrence, to remove the sump/clarifier.

The sump/clarifier is approximately 6 1/2 feet long and 2 1/2 feet wide; its depth is unknown. The sump/clarifier is constructed of concrete and is filled with gravel. Soil samples were collected from the fill material inside the sump/clarifier and from several locations surrounding the sump/clarifier where soil discoloration was observed, at depths up to 5 feet. Excavated material was placed in covered roll-off bins pending appropriate disposal. Preliminary analytical results indicate the presence of volatile organic compounds and petroleum hydrocarbons in the samples. Following completion of the sampling, the area was covered with heavy gauge plastic and weighted to keep the excavation secure.

A division of APBI Environmental Sciences Group, Inc.

One Park Plaza • Suite 700 • Irvine, California 92714 • USA • Tel: (714) 261-5151 • (213) 587-5151 • Fax: (714) 261-6202

Prior to removal of the sump/clarifier, its contents will be removed and the inner concrete surfaces will be cleaned using a pressure washer. Solid and liquid wastes will be containerized separately. After cleaning, the sump/clarifier will be carefully inspected for cracks, breaks, and fractures. In addition, any sewer lines encountered (but not currently known to be present) leading in to and out of the sump/clarifier will be examined and capped. Following the inspection, the sump/clarifier will be demolished, the broken concrete excavated, and the concrete debris staged separately from the other solid and liquid wastes generated during the sump/clarifier removal process. Excavation of visually contaminated soil, if encountered, will expand beyond the sump/clarifier no more than 15 feet horizontally and 5 feet vertically. If the sump/clarifier is greater than 5 feet deep, then the excavation will continue to a maximum of 1 foot below the bottom of the sump/clarifier. It is infeasible and impractical to do any major excavation in the area of the sump/clarifier, as this area represents only a small portion of the site currently under investigation.

Up to 12 soil samples will be collected from the sidewalls and bottom of the excavation. Samples will be collected from a cherry picker platform using a decontaminated hand auger sampler equipped with a 6-inch long stainless steel tube. The sampler will be driven into the soil using a slide hammer. After filling, each sample tube will be capped, labelled, and stored on ice pending same-day delivery to the laboratory. Samples will be analyzed by a California State-certified laboratory in accordance with EPA Method 8010/8020 (volatile organic compounds), EPA Method 8270 (semi-volatile organic compounds), EPA Method 8015 Modified (total extractable petroleum hydrocarbons), EPA Method 8080 (PCBs), and EPA Method 6010 for Title 22 metals. Chain-of-custody procedures will be followed.

It is anticipated that after the soil samples are collected, the excavation will be lined immediately with heavy gauge plastic, backfilled with clean fill, and resurfaced with asphalt.

All excavation and sampling work will be performed in accordance with the approved Building 2 subsurface investigation Health and Safety Plan (included in the *Report for Subsurface Investigation of Petroleum Hydrocarbons and Work Plan for Additional Subsurface Investigation*). A full-time health and safety officer will be present at the site during all field activities. Soil vapors emanating from the excavated soils (if any) will be monitored in accordance with the South Coast Air Quality Management District 1166 Rule.

Upon receipt of the analytical data, a brief letter report will be prepared and submitted to the RWQCB to document the clarifier removal. The report will include a summary of the investigative procedures, sample locations, analytical data, chain-of-custody forms, and visual observations.

We hope this is all the information that you require at this time. Please call any of the undersigned if you should have any questions.

Very truly yours,

Rebekah J. Wale
Senior Associate

Carol L. Serlin, R.G.
Manager, Geosciences

George O. Linkletter, Ph.D.
Principal

cc: Ms. Ana Veloz, RWQCB
Mr. Philip Kani, LAFD
ITT Distribution